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**Subject:** Chart of Gulf / Travelers Policies  
**Date:** Monday, November 18, 2013 2:10:17 PM  
**Attachments:** [Gulf and Travelers Policies.xlsx](#)

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Lori,

Attached please find a spreadsheet of policies for which Gulf/Travelers may request releases if Gulf contributes to a settlement. Travelers now owns both Gulf and Aetna, so policies issued by Gulf, Travelers, and Aetna are listed on the attached chart. I used blue shading to reflect policies with sudden & accidental pollution exclusions. Red shading reflects policies that either have absolute pollution exclusions or are otherwise likely unavailable to offer coverage. Green shading indicates the Gulf policy that we discussed on this morning's telephone call.

Because Dillingham Construction was an affiliate of Dillingham Ship Repair (Dillingham Ship Repair is Dillingham entity implicated in the Portland Harbor matter), policies issued to Dillingham Construction (as opposed to Dillingham Corporation, the parent company) likely will not cover Dillingham Ship Repair liability, even if there were no pollution exclusion.

Except for the Gulf policy, Travelers has denied liability under every other policy listed on this chart.

Thank you,  
Kira

**Kira S. Dabby**

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Named Insured	Carrier	Policy Number	Policy Period	Limits	Type
Dillingham Corporation	Aetna Casualty & Surety Co.	?	5/1/77-5/1/78		
Dillingham Corporation	Aetna Casualty & Surety Co.	05AL189534SCA	5/1/81-5/1/84	\$1 Mil	
Dillingham Corporation	Aetna Casualty & Surety Co.	05 GL 9 SCA	5/1/81-5/1/82	\$1 Mil	
Dillingham Corporation	Aetna Casualty & Surety Co.	05 GL 9 SCA	5/1/80-5/1/81	\$1 Mil/\$5 Mil	
<b>Dillingham Construction</b>	Aetna Casualty & Surety Company	05XS6150SCA	6/29/87 - 5/1/88	\$10 Mill excess underlying limit or retained limit of \$500,000	
<b>Dillingham Construction Holdings</b>	Aetna Casualty & Surety Company	05XS598404SCA	5/1/88 to 5/1/89	\$8 Mill excess underlying limit or retained limit of \$800,000	
<b>Dillingham Construction</b> (DSR is covered if subsidiary)	Aetna Casualty & Surety Company	05AL636018SCA	6/29/87 - 5/1/88	Unknown	Unk
<b>Dillingham Construction Holdings</b> (DSR as affiliate may be additional insured)	Aetna Casualty & Surety Company	05GL5000588SCA	5/1/88 - 5/1/89	Unknown	Unk

Dillingham Corporation	Aetna Casualty & Surety Company	05AL42724SR	1/1/65 - 7/1/65	Unknown	Unk
Dillingham Corporation	Aetna Casualty & Surety Company	05AL189541SCA	5/1/84-5/1/86	\$1 Mil	
Dillingham Corporation	Aetna Casualty & Surety Company	05AL590844SCA	5/1/86 until 6/29/87	Not Listed	
Dillingham Corporation	Aetna Casualty & Surety Company	05XS6138SCA	5/1/86 until 6/29/87	\$16 Mil	
Dillingham Corporation	Aetna Casualty & Surety Company	05AL189541SCA	4/19/84 until Cancelled	\$500k	
Dillingham Corporation	Aetna Casualty & Surety Company	05AL189541SCA	4/26/83 until Cancelled	\$500k	
DIL Trust	Gulf Underwriters Insurance Co	GA6079144	10/22/97 to 10/22/14	\$10M per occ/ \$20M total	
Dillingham Entities	Travelers	05 AL 189524 SC	5/1/79-5/1/81		
Dillingham Entities	Travelers	05 GL 591651 SC	5/1/85-5/1/86		

Dillingham Corporation	Travelers (Policy says Aetna)	05XN109WCA	5/1/83 - 5/1/84	\$5M part of \$50M excess. \$200M excess primary	
Dillingham Corporation	Travelers (Policy says Aetna)	05XN133WCA	5/1/84 - 5/1/85	\$5M part of \$50M excess. \$200M excess primary	
Dillingham Corporation	Travelers (Policy says Aetna)	05XN164SCA	5/1/85 - 5/1/86	\$22.5M part of \$50M excess \$200M excess primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	05XN289SCA	6/29/87 - 5/1/88	Unknown	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	05XN392SCA	5/1/89 - 5/1/90	\$5M excess \$30M excess Primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	05XN438SCA	5/1/90 - 5/1/91	\$15M excess \$35M excess Primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	05XN496SCA	5/1/91 - 5/1/92	\$15M excess \$35M excess Primary	

<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	5XN22205640SC	5/1/92 - 5/1/93	\$15M part of \$40M excess \$35M excess primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	5XN23374147SC	5/1/93 - 5/1/94	\$15M part of \$35M excess \$40M excess primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	5XN24166342SC	5/1/94 - 5/1/95	\$10M part of \$35M excess \$65M excess primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	5XN24864622SC	5/1/95 - 5/1/96	\$10M part of \$30M excess \$70M excess primary	
<b>Dillingham Construction Holdings</b>	Travelers (Policy says Aetna)	5XN255138626SC	5/1/96 - 5/1/97	\$10M part of \$30M excess \$70M excess primary	

Primary or Excess	Source	Notes	Policy?
Bumpershoot	DIL Trust	Travelers cannot find evidence of this policy, nor can DIL Trust find any backup documentation	
Primary	1-4-13 Travelers Letter (no limit); Port of Portland Spreadsheet; DIL Trust	Sudden & Accidental Pollution Exclusion	YES
Primary	Port of Portland Spreadsheet	Likely Sudden & Accidental Pollution Exclusion	YES, for that policy number
Primary	Port of Portland Spreadsheet (no \$5 million); 1-4-13 Travelers Letter (no limit); DIL Trust	Sudden & Accidental Pollution Exclusion	YES
Excess Umbrella	1/4/13 Travelers Letter, Travelers policy	Pollution Exclusion clause	YES
Excess Umbrella	1/4/13 Travelers Letter, Travelers policy, DIL Trust	Pollution Exclusion clause	YES
Primary	1/4/13 Travelers Letter; DIL Trust	Pollution Exclusion clause	YES
Primary	1/4/13 Travelers Letter; DIL Trust	Pollution Exclusion clause	YES

Primary	1-4-13 Travelers Letter; DIL Trust	Irrelevant: policy issued to DSR before DSR operated in Portland	YES
Primary	1-4-13 Travelers Letter (no limit); Port of Portland Spreadsheet; DIL Trust	Sudden & Accidental Pollution Exclusion	YES
Primary	1-4-13 Travelers letter, no limit; Port of Portland Spreadsheet; DIL Trust list	Pollution Exclusion clause - CANNOT VERIFY	YES
Excess Umbrella	1-4-13 Travelers letter, Travelers policy; Port of Portland Spreadsheet; DIL Trust	Pollution Exclusion clause	YES
Primary	Port of Portland Spreadsheet	Sudden & Accidental Pollution Exclusion	YES
Primary	Port of Portland Spreadsheet	Sudden & Accidental Pollution Exclusion	YES, for that policy number
[Excess]	Gulf Policy	Currently paying defense fees subject to reservation of rights	YES
	HI Complaint	Only covers liabilities in Hawaii and Texas	
	HI Complaint	Only covers professional liability	

Excess Overlayer	1/4/13 Travelers Letter	Underlying policy not exhausted; no pollution exclusion but follows form; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; no pollution exclusion but follows form; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter; DIL Trust	Underlying policy not exhausted; no pollution exclusion but follows form; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion (noted but not attached)	YES - partial
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion	YES



Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion on Travelers portion; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion on Travelers portion; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion on Travelers portion; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion on Travelers portion; other shares unknown	YES
Excess Overlayer	1-4-13 Travelers Letter	Underlying policy not exhausted; pollution exclusion on Travelers portion; other shares unknown	YES

























































































